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UNITED STATES DISTRICT COURT JUN 13 2001
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
MARIE ANDREA CLERK
DEPUTY CLERK

'WILLIAM DONALD MARSHALL,
PETITIONER,

Civil No. 1:CV-01-0949

vs.

J. Rambu

ROBERT L. RAIGER,
RESPONDENT,

MOTION FOR EXTENSION
OF TIME TO ANSWER
RESPONDENT'S REPLY

COMES NOW PETITIONER who RESPECTFULLY REQUEST AN

EXTENSION OF TIME WITH WHICH TO SUBMIT AN ANSWER

TO RESPONDENT'S REPLY DATED JUNE 8, 2001 PURSUANT

TO THIS COURT'S ORDER OF JUNE 5, 2001.

PETITIONER ASSERT THAT HE NEEDS AN ADDITIONAL FIFTEEN

(15) DAYS TO THE FIFTEEN (15) DAYS ALREADY PROVIDED IN

this COURT'S ORDER DATED JUNE 5, 2001 IN ORDER TO ACQUIRE

EVIDENCE which will PROVE TO THE CONTRARY OF RESPONDENT'S

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REPLY STATEMENTS. IN FURTHERANCE TO PETITIONER'S NEED FOR AN ADDITIONAL FIFTEEN (15) DAYS, SUCH ADDITIONAL TIME IS NEEDED IN ORDER TO ACQUIRE LEGAL REFERENCE MATERIAL IN THE LEBANON COUNTY LAW LIBRARY WHICH TAKES SEVERAL DAYS WHERE NO ADEQUATE LAW LIBRARY IS AVAILABLE AT THE LEBANON COUNTY CORRECTIONAL FACILITY. PETITIONER ALSO NEEDS THE ADDITIONAL TIME TO PROVE BY EVIDENCE THAT RESPONDENT'S EXHIBIT '2' IS A PRODUCT OF DECEPTION SINCE PETITIONER WHO IS 'LEGALLY BLIND' AS ONE OF SEVERAL SEVERE CONDITIONS ASSOCIATED WITH HIS 'ALBINISM', WAS UNABLE TO READ THE DOCUMENT REFERENCED AS EXHIBIT '2' SINCE ^{HE} WAS UNABLE TO RETRIEVE HIS READING MAGNIFIER FROM POCKET DUE TO HANDCUFF RESTRAINTS TO HIS BELT CENTER. PETITIONER HAVING SEEN THE DOCUMENT NOW FOR FIRST TIME AS NOW

RESPONDENT'S EXHIBIT '2' ³ WITH AID OF HIS READING MAGNIFIER
WILL ASSERT THAT PETITIONER didn't KNOWING WAIVE HIS
SIXTH AMENDMENT RIGHT TO COUNSEL, RATHER ABSENT HAVING
VISUAL AID DEVICE TO READ, PETITIONER WAS DECEIVED
BY BEING TOLD TO SIGN HIS NAME BY THE 'X's THAT TOO
THE DISTRICT JUSTICE POINTED FINGER TO WHICH HE CLAIMED
PETITIONER WAS MERELY ACKNOWLEDGING HIS RIGHTS AS THE
COURT ONLY VERBALLY QUOTED SECOND PARAGRAPH 'AFFIDAVITS OF
RIGHTS' YET THE COURT POINTED FOR PETITIONER TO SIGN IN
TWO PLACES WHICH PETITIONER NOW SEES WITH HIS MAGNIFIER
WAS TO WAIVE COUNSEL WHICH PETITIONER WOULD HAVE NEVER
DONE HAD HE BEEN ABLE TO SEE WHAT HE WAS ASKED TO
SIGN. NOTABLY, DUE TO NO VISUAL AID AT TIME OF BEING
ASKED TO SIGN, PETITIONER'S SIGNATURE IS NOT ONLY

UNLEGIBLE, BUT NOT POSITIONED OR SIGNATURE LINE.

WHEREFORE, PETITIONER PRAYS THAT THIS HONORABLE COURT
GRANT AN EXTENSION OF TIME FOR HIM TO FILE HIS ANSWER
TO RESPONDENT'S REPLY FOR TOTAL OF THIRTY (30) DAYS FROM
DATE OF RESPONDENT'S REPLY i.e. JUNE 7, 2001.

DATED THIS 10TH DAY OF
JUNE, 2001.

RESPECTFULLY SUBMITTED,

William Donald Marshall
Pro se, Petitioner

Certificate of Service

This is to certify that I have served a copy of the
foregoing on counsel for Respondent on the last day affixed
above, and by U.S. Mail.

William Donald Marshall